

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

STEVEN G. MILLETT,)	
MELODY J. MILLETT,)	
On Behalf Of Themselves and)	
All Others Similarly Situated,)	
Plaintiffs,)	
)	
v.)	C.A. No.: 05-599-SLR
)	
TRUELINK, INC.,)	Class Action
a Trans Union Company,)	
Defendant.)	

MOTION TO APPOINT INTERIM CLASS COUNSEL

Named Plaintiffs, Steven G. Millett and Melody J. Millett, by and through their undersigned attorneys, hereby move this Court, pursuant to Rule 23(g)(2)(A), to appoint their counsel of record as interim class counsel in this action. In support of their motion, Named Plaintiffs state as follows:

1. Named Plaintiffs have filed this action stating claims on behalf of themselves and similarly situated plaintiffs ("Class Plaintiffs").
2. Named Plaintiffs are represented by a team of attorneys ("Litigation Team") consisting of the following individuals:

Bryson R. Cloon
Kansas Bar No. 08660
Missouri Bar No. 36843
Cloon Law Firm
11150 Overbrook Road
Leawood, KS 66211
Phone: (913) 661-9600
Facsimile: (913) 661-9614

Barry R. Grissom

Kansas Bar No. 10866
7270 W. 98th Terrace
Building 7, Suite 220
Overland Park, Kansas 66212
Phone: (913) 341-6616

B. Joyce Yeager
Kansas Bar No. 18932
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Phone: (913) 648-6673

Michael W. Blanton
Missouri Bar No. 46490
Swanson Midgley, LLC
2420 Pershing Road, Ste. 400
Kansas City, Missouri 64108
Phone: (816) 842-6100

3. The individual qualifications of the members of the Litigation Team are as follows:

Bryson R. Cloon

Mr. Cloon has been admitted to the state and federal courts of Kansas since 1975 and has been admitted to the state and federal courts of Missouri since 1987. Mr. Cloon is also a member of the bar for the Eighth and Tenth Circuit Courts of Appeal. Mr. Cloon has been a member of the bar for the United States Supreme Court since 1991. Mr. Cloon has tried lawsuits in Kansas, Missouri and Colorado. Mr. Cloon has previously been involved in the class actions pertaining to exploding tire rims and he was appointed as State Liaison Counsel for Kansas and the Western District of Missouri in the nation-wide breast implant class actions involving Dow Chemical, Dow Corning, 3M, Bristol-Myers Squibb and Baxter corporations (case caption: Heidi Lindsey, et al. v. Dow Corning Corp., et al., United States District Court for the Northern District of Alabama). Mr. Cloon has been selected for inclusion in Best Lawyers in America and Outstanding Lawyers of America. Mr. Cloon is AV-rated by Martindale-Hubbell and is designated as a Preeminent Attorney by Martindale-Hubbell (a distinction given to less than 5% of the attorneys listed by Martindale-Hubbell).

Barry R. Grissom

Mr. Grissom has been a member of the Kansas Bar since 1983. He has been admitted to practice before the United States District Court for the District of Kansas since 1983 and has been admitted to practice before the United States District Court for the Western District of Missouri since 1998. Mr. Grissom has been involved in eighty-eight (88) different matters filed in the federal courts, including five (5) class actions. Mr. Grissom is AV-rated by Martindale-Hubbell.

B. Joyce Yeager

Ms. Yeager has been a member of the Missouri Bar since 1997 and has been a member of the Kansas Bar since 1998. Ms. Yeager spent two years working as a clerk on the Central Staff for the Kansas Supreme Court. Ms. Yeager currently represents consumers, including other identity theft victims, in her private practice. Ms. Yeager has substantial experience in federal court procedure and appellate law, as well as extensive experience in handling complex litigation matters.

Michael W. Blanton

Mr. Blanton has been a member of the Missouri Bar since 1997. Mr. Blanton is also a member of the bar for the Eighth and Tenth Circuit Courts of Appeal. Mr. Blanton previously clerked for Judge Stephen N. Limbaugh, Jr. of the Missouri Supreme Court. Mr. Blanton has previously worked in the area of products liability litigation in which he regularly handled complex litigation matters. Mr. Blanton has focused his practice in the area of appellate litigation for the past six years and, in that capacity, has handled appeals in the appellate courts of Kansas and Missouri and in the Eighth and Tenth Circuit Courts of Appeal. Mr. Blanton currently serves as Chair of the Appellate Litigation Department at Swanson Midgley, LLC.

4. The Litigation Team has been responsible, to date, for handling all aspects of the preparation and pursuit of this action including, but not limited to, investigation of claims, research of potential claims and theories, and filing of pleadings.
5. The Litigation Team has retained local counsel in this action.

6. The Litigation Team, to date, has collectively devoted hundreds of hours to the preparation and pursuit of this action.
7. The Litigation Team has retained additional administrative staff specifically for the purpose of assisting in the coordination and handling of this action.
8. Named Plaintiffs anticipate that some discovery will be necessary prior to certification of the class described in Named Plaintiffs Complaint.
9. Named Plaintiffs anticipate that it may be necessary to respond to one or more motions pertaining to Named Plaintiffs Complaint and/or the potential class, prior to certification of the class.
10. Named Plaintiffs believe it will be beneficial to certification, and in the best interest of potential class members, for this Court to appoint the Litigation Team as Interim Class Counsel for purposes of guiding this action through the certification process.
11. Pursuant to Local Rule 7.1.1, Plaintiffs have conferred with Defendant regarding Plaintiffs' Motion to Appoint Interim Class Counsel and Defendant has indicated that it does object to the granting of Plaintiffs' Motion.

WHEREFORE, for the reasons stated herein, Named Plaintiffs respectfully request that this Court appoint Named Plaintiffs' counsel of record, including all members of the Litigation Team identified herein, as Interim Class Counsel in this action.

Respectfully submitted,

/s/ Christopher J. Curtin

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Phone: (816) 842-6100

COUNSEL FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I, Christopher J. Curtin, Esq., hereby certify that on December 21, 2005, I electronically filed the foregoing Motion to Appoint Interim Class Counsel with the Clerk of the District Court using CM/ECF, which will send notification of such filing to the following:

William M. Lafferty, Esq.
Jerry Clyde Harris, Jr., Esq.
Morris Nichols Arsht & Tunnell
1201 N. Market St.
Wilmington, DE 19801

ERISMAN & CURTIN

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DATE: December 21, 2005